

# Exhibit D

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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IN RE: CENTURYLINK SALES  
PRACTICES AND SECURITIES  
LITIGATION

MDL No. 17-2795 (MJD/KMM)

This Document Relates to:  
Civil File No. 18-296 (MJD/KMM)

**DECLARATION OF BRIAN DE HAAN  
IN SUPPORT OF PLAINTIFFS'  
MOTION FOR CLASS  
CERTIFICATION AND  
APPOINTMENT OF CLASS  
REPRESENTATIVES AND CLASS  
COUNSEL**

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I, Brian de Haan, on behalf of Lead Plaintiff the State of Oregon by and through the Oregon State Treasurer and the Oregon Public Employee Retirement Board, on behalf of the Oregon Public Employee Retirement Fund ("Oregon"), declare:

1. I am an Assistant Attorney General in the Oregon Department of Justice's Civil Enforcement Division, and I am authorized to make legal decisions on behalf of Oregon. If called to testify, I could and would competently testify thereto to all facts within my personal knowledge.
2. I submit this declaration in support of Plaintiffs' Motion for Class Certification and Appointment of Class Representatives and Class Counsel.
3. Oregon purchased CenturyLink, Inc. ("CenturyLink") securities between March 1, 2013 and July 12, 2017 (the "Class Period") as set forth in prior pleadings, and suffered

damages thereby when the price of CenturyLink securities declined following the corrective disclosures alleged in the Complaint.

4. Oregon did not purchase the securities that are the subject of this action at the direction of counsel or in order to participate in any action arising under the federal securities laws.

5. Oregon understands that the Private Securities Litigation Reform Act of 1995 was intended to encourage institutional investors and others with meaningful losses to direct securities class actions. As a class representative, Oregon, a sophisticated institutional investor, is committed to vigorously prosecuting this litigation. Oregon intends to obtain the largest recovery for the proposed class consistent with good faith and sound judgment.

6. Oregon understands the duties of a class representative, including the responsibilities to review and approve court filings; to search for and provide documents and other information, as requested by counsel; to consider and approve, if appropriate, settlement proposals by defendants; to travel to, and appear, for a deposition; and to testify at trial in this case. Oregon is willing to undertake each of these activities.

7. Oregon understands that it owes a fiduciary duty to all members of the Class to provide fair and adequate representation, and to continue to work actively with Class counsel in order to prosecute this action in the interests of the Class members and to try to obtain the best outcome for them, consistent with good faith and meritorious advocacy.

8. Oregon has diligently pursued the effective prosecution of this Action and actively monitored its progress, including by reviewing the Consolidated Securities Class Action Complaint in this matter and authorizing its filing by counsel, reviewing all material filings and discovery responses, successfully opposing a motion to dismiss, assisting in discovery,

participating in strategic decisions, and frequently discussing case updates with counsel, and is willing and able to fulfill all of the duties as a class representative.

9. I further understand that it has been, and continues to be, my duty to supervise this litigation and Lead Counsel. Since I joined this case, I have been in consistent contact with my counsel and have received, reviewed and responded to communications and draft documents that I have been sent. I intend to continue to do so. I have also been consulted regarding decisions that potentially could affect the outcome of the case. Lead Counsel has kept me informed at all times concerning the status and progress of this Action, the strengths and weaknesses of the case, and the prospects for settlement. I expect that this, too, will continue. It is my intention to continue to work with Lead Counsel to vigorously prosecute this case on behalf of the class and to provide fair and adequate representation consistent with good faith and sound judgment, including consulting with Lead Counsel on the status of the litigation, proposed case strategies and tactics, settlement negotiations, and other matters pertinent to overseeing the litigation. I accept and will diligently perform all such duties.


10. Oregon is willing to serve as a representative party on behalf of the Class.

11. Oregon will not accept any payment for serving as a representative party on behalf of the Class beyond Oregon's pro rata share of any recovery, except such reasonable costs and expenses directly relating to the representation of the Class, as ordered or approved by the Court.

12. Oregon seeks appointment of BLB&G and Stoll Berne as Class Counsel for the proposed Class based on their substantial experience and expertise in prosecuting securities class actions. Oregon believes that BLB&G and Stoll Berne possess the necessary experience and resources to prosecute this case vigorously and effectively on behalf of the proposed Class.

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED this 21st day of January, 2020.



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Brian de Haan  
Assistant Attorney General  
Oregon Department of Justice  
*Oregon Public Employees Retirement Fund*